

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Donna M. Fitzpatrick

Debtor

Case No.: 19-11499-mdc

Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Donna M. Fitzpatrick, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor's filed a Chapter 13 Bankruptcy on March 12, 2019.
2. The Chapter 13 filing was assigned case number 19-11499.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about November 20, 2019.
4. Debtor operates a salon and due to the COVID-19 pandemic was unable to operate for a significant period of time.
5. As a result, the Debtor fell behind in her payments to the Trustee.
6. Debtor has since re-opened the salon and her income is steadily increasing.
7. Additionally, Debtor's husband was unemployed for a period of time and has recently secured new employment.
8. Pursuant to the CARES Act, Debtor has experienced a material financial hardship, directly or indirectly caused by the COVID-19 virus.
9. Debtors' Plan was originally confirmed prior to March 27, 2020.
10. In light of this, and to avoid dismissal of her case, Debtor is humbly requesting that she be allowed to modify and extend her Chapter 13 Plan to 7 years.

11. This Plan remains a 100% payback to the unsecured creditors. (See proposed modified Plan marked as "Exhibit A").

12. Lastly, this Plan is feasible based on the Debtors' current income and expenses.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: July 16, 2021

/s/ Brad J. Sadek, Esq.
Brad J. Sadek, Esquire
Attorney for Debtor
1315 Walnut Street, Suite 502
Philadelphia, PA 19107